

FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463.

Pebruary 18, 2005

Richard L. Trumka, Tressurer AFL-CIO COPE Political Contributions Committee 815 16th: Street N.W. Washington, DC 20006

Response Due Date: March 21, 2005

Identification Number: C00003806

September Monthly Report (8/)/04-8/31/04) and Amended October Reference:

Monthly Report (9/1/04-9/30/04), received 10/21/04

Dear Mr. Trumka:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Your response dated 01/10/2005 states that (1) "CWA/AFL-CIO members authorize joint contributions to CWA a separate segregated fund, CWA COPE PCC, and the AFL-CIO a separate segregated fund," (2) "AFL-CIO COPE PCC thus operates under a combined collecting agent/joint fundraising arrangement with CWA through its separate segregated fund, CWA-COPE PCC, CWA, acting through CWA-COPE PCC, is a collecting agent for AFL-CIO COPE PCC in accordance with 11 C.F.R. 102.6(b)((1)(iv)," and (3) "the itemized reporting your letter requests from AFL-CIO COPE PCC would be both superfluous and contradictory to the itemized reporting by CWA COPE PCC, which records and reports all contributions in accordance with 11 C.F.R. Part 194, and which makes periodic joint fundraising transfers to AFL-CIO COPE PCC that are fully reported by both AFL-CIO COPE PCC and CWA COPE PCC."

-As per 11 CFR §102.6(b)(7), "a separate segregated fund receiving contributions collected by a collecting agent shall report the full amount of each contribution received as a contribution for the original contributor to the extent required by 11 CFR 104.3(a)." If the amounts in question were contributed by individuals and transmitted to your committee by a collecting

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agent, the activity should be included on Line 11(a)(i) of the Detailed Summary Page. Any contribution from an individual exceeding \$200 in the aggregate during the calendar year should be itemized on a supporting Schedule A. Collecting agents need not be identified on your report. Please amend your report by providing the omitted memo schedule(s).

Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1137.

Sincorely,

Katrina Senger

Campaign Finance Analyst Reports Analysis Division